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Attorneys for Plaintiff ROBERT BIELBY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

ROBERT BIELBY, an individual;

Plaintiff,

v.

MICRON TECHNOLOGY INC., a  
Delaware corporation; and Does 1-10,  
inclusive;

Defendants.

Case No. 2:23-cv-2356-KJM-CKD

**STIPULATION REGARDING  
PLAINTIFF'S ALLEGED  
DAMAGES**

Pursuant to Local Rule 143, Plaintiff Robert Bielby (“Plaintiff”) and Defendant Micron Technology Inc. (“Micron”) (collectively, the “Parties”) stipulate to the following:

1. In bringing this action, Plaintiff does not assert and will not request any damages for emotional distress other than “garden variety” damages, which are emotional damages that are simple, usual, and that may be incidental to his underlying claims in this matter;

2. Plaintiff does not allege and will not claim that Micron caused him to suffer any specific mental or physical injury;

3. Plaintiff does not allege and will not claim that he had any pre-existing mental or physical condition that was exacerbated by any alleged conduct of Micron;

4. Plaintiff will not testify that he sought or obtained psychological or psychiatric treatment as a result of any alleged conduct of Micron; and

5. Plaintiff will not call any treating physician, therapist, or other medical provider or seek to introduce any documents to establish any physical or emotional injury as a basis for damages in this matter.

Dated: April 17, 2024

JONES DAY

By: /s/ Rick Bergstrom

Rick Bergstrom

Attorneys for Defendant MICRON  
TECHNOLOGY INC.

1 Dated: April 17, 2024

KING & SIEGEL LLP

2  
3 By: /s/ Robert J. King (as authorized on  
4 4/16/24)

Robert J. King

5 Attorneys for Plaintiff ROBERT  
6 BIELBY

7  
8 **ORDER**

9 PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

10 DATED: April 22, 2024.

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14 CHIEF UNITED STATES DISTRICT JUDGE